
**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	
	:	
V.	:	18-CR-97
	:	
ROSS ROGGIO	:	
ROGGIO CONSULTING, LLC	:	

MOTION FOR LEAVE TO FILE PRETRIAL MOTIONS

AND NOW, comes Defendants, by and through Counsel, who file this Motion, averring as follows:

1. Defendants were initially charged via Indictment on March 20, 2018, with multiple counts related to weapons exportation.
2. Pretrial Motions were filed and litigated by prior counsel.
3. A Superseding Indictment was filed on February 15, 2022, charging Defendants with torture.
4. Prior counsel did not file pretrial motions within the deadline.
5. Undersigned Counsel were recently retained and entered appearance on August 9 and 10, 2022.
6. This Honorable Court granted Defendants' Motion For Leave to file Pretrial Motions (Doc. 154), via Court Order of August 17, 2022 (Doc. 155), extending the deadline to file pretrial motions, limited to the new claims and allegations set forth in the Superseding Indictment, to September 19, 2022.
7. Although the Defendants requested case discovery upon entry of new defense counsel, the same was made available by the Government yesterday, September 7, 2022, picked-up this morning, September 8, 2022, and is voluminous in nature.
8. Some discovery remains outstanding, due to the necessity of Defense Counsel having to provide the Government with an additional storage device, as the 2 terabyte external drive originally provided did not have enough storage space to contain all of the discovery.
9. Defense Counsel cannot reasonably and effectively review and analyze all of the discovery, conduct any necessary legal research, and draft pretrial motions and briefs in support of the same between today's date of receipt of discovery and the current pretrial motion deadline of September 19, 2022.

10. These motions are necessary to the preparation of an effective defense in this matter, and the interests of justice lie in favor of permitting leave to file such motions.
11. AUSA Todd Hinkley concurs in the request to file pretrial motions in regard to the torture charges which were added in the Superseding Indictment.
12. The Defense is aware that the Court has set this case for Trial on February 6, 2023.
13. Due to the voluminous nature of the file in this case and the unique subject matter involved, counsel is requesting an additional thirty (30) days from the current pretrial motion deadline of September 19, 2022, to review discovery and file pretrial motions.

WHEREFORE, Defendant respectfully requests this Honorable Court grant the instant motion and provide leave to file pretrial motions within thirty (30) days from the current pretrial motion deadline of September 19, 2022.

Respectfully Submitted

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